

Exhibit I

Solar Titan's Sept. 4, 2022 CID Responses

COMMONWEALTH OF KENTUCKY
OFFICE OF THE ATTORNEY GENERAL

In re:

Subpoena and Civil Investigative Demand
(dated June 6, 2022)

Ideal Horizon Benefits LLC d/b/a
Solar Titan USA

**IDEAL HORIZON BENEFITS LLC D/B/A SOLAR TITAN USA'S RESPONSES AND
OBJECTIONS TO CIVIL INVESTIGATIVE DEMAND**

Ideal Horizon Benefits LLC d/b/a Solar Titan USA ("Solar Titan USA") hereby supplements its prior responses and objections to **Request No. 7** in the above Civil Investigative Demand ("CID"). In responding, Solar Titan USA reserves (a) all rights and objections with respect to the Investigative Demand's definitions, instructions, and requests; (b) the right to assert privilege if documents containing privileged information are inadvertently produced; and (c) the right to supplement and amend any information or material provided in response to the CID.

REQUESTS

7. Identify all current and former employees of Solar Titan who are currently or were previously involved in the selling, marketing, installation, or financing of Solar Power Systems in Kentucky. For each employee Identified, separately Identify the position/title held by each individual with Solar Titan and that individual's corresponding duties and responsibilities.

ANSWER: Subject to Solar Titan USA's objection and its ongoing search for documents, Solar Titan states:

Richard Atnip
Principal
michael@solartitanusa.com
(865) 392-1036 ex. 206
414 N. Peters Rd
Knoxville, TN 37922

4880-1398-4817.1

General responsibilities: Mr. Atnip is semi-retired and serves in a general advisory role

Sarah Kirkland
Principal
sarah@solar titanusa.com

(865) 392-1036 ex. 206
414 N. Peters Rd
Knoxville, TN 37922

General responsibilities: Oversees operations, operation processes and managers

Brandon Stephens
Controller
brandonstephens@solar titanusa.com

(865) 392-1036 ex. 324
414 N. Peters Rd
Knoxville, TN 37922

General responsibilities: Oversees company accounting

Stacey Monks
General Manager
staceym@solar titanusa.com

(865) 392-1036 ex. 127
414 N. Peters Rd
Knoxville, TN 37922

General responsibilities: Addresses day-to-day needs of various company departments

Suzanne French
Human Resources Manager
suzannefrench@solar titanusa.com

(865) 392-1036 ex. 272
414 N. Peters RD
Knoxville, TN 37922

General responsibilities: Manages human-resources issues and recruiting

Craig Kelley
Sales and Training-Reports to Richard Atnip
shawnah@solar titanusa.com

(865) 392-1036 ex. 206
414 N. Peters Rd
Knoxville, TN 37922

General responsibilities: Handles sales management, manages territory managers, and facilitates sales-process development

John Carroll
Director of Training
johnc@solar titanusa.com

(865) 392-1036 ex. 121

414 N. Peters Rd

Knoxville, TN 37922

General responsibilities: Handles sales training management, manages sales trainers, and facilitates continual development of the sales team

John Sherrod

Marketing and Call Center Manager

johns@solartitanusa.com

(865) 392-1036 ex. 103

414 N. Peters Rd

Knoxville, TN 37922

General responsibilities: Manages call center shift leads and process

Dale Roden

Technical Operations Manager

daleroden@solartitanusa.com

(865) 392-1036 ex. 204

414 N. Peters Rd

Knoxville, TN 37922

General responsibilities: Manages technical training and field quality control

Ben Sloan

Administrative Manager

benjaminsloan@solartitanusa.com

(865) 392-1036 ex. 209

414 N. Peters Rd

Knoxville, TN 37922

General responsibilities: Manages team that facilitates the interconnection with the customer and utility company

Jessica Powers

Permitting Lead

jessicapowers@solartitanusa.com

(865) 392-1036 ex.214

414 N. Peters Rd

Knoxville, TN 37922

General responsibilities: Coordinates permitting and inspections

Jessica Rial

Scheduling Manager

jessicarial@solartitanusa.com

(865) 392-1036 ex.126

414 N. Peters Rd

Knoxville, TN 37922

General responsibilities: Manages installation and service scheduling

Kody Johnston
Territory Sales Manager
kodyjohnston@solartitanusa.com

(865) 392-1036 ex. 121

414 N. Peters Rd

Knoxville, TN 37922

General responsibilities: Reports to Director of Sales; manages the sales team

Dan Shank
Sales Field Trainer
danshank@solartitanusa.com

(865) 392-1036 ex. 120

Lexington, KY 40504

General responsibilities: Accompanies new sales representatives as part of continual training and development, Runs sales appointments

Keenan Bowman
Sales Field Trainer
Keenanbowman@solartitanusa.com

(865) 392-1036 ex. 120

2333 Alexandria Dr

Lexington, KY 40504

General responsibilities: Accompanies new sales representatives as part of continual training and development, runs sales appointments

Jessica Crosswhite
Sales Representative
jessiacrosswhite@solartitanusa.com

(865) 392-1036 ex. 120

2333 Alexandria Dr

Lexington, KY 40504

General responsibilities: Provides product information and facilitates product sales to consumers

Randy Foster
Sales Representative
randyfoster@solartitanusa.com

(865) 392-1036 ex. 120

2333 Alexandria Dr

Lexington, KY 40504

General responsibilities: Provides production information and facilitates product sales to consumers

John Collins
Sales Representative

johncollins@solar titanusa.com

(865) 392-1036 ex. 120

2333 Alexandria Dr

Lexington, KY 40504

General responsibilities: Provides product information and facilitates product sales to consumers

In addition to the persons above, Solar Titan USA employs approximately ten installers who perform the actual installations in Kentucky.

All responses are subject to Solar Titan USA's ongoing investigation, which includes but is not limited to a search for former employees, information that is not readily available if it exists. Solar Titan USA will supplement further its answer if additional information is found.

Dated: September 4, 2022

Respectfully submitted:

s/Ty E. Howard

Ty E. Howard

thoward@bradley.com

Frankie Spero

fspero@bradley.com

Bradley Arant Boult Cummings LLP

1600 Division Street, Suite 700

Nashville, Tennessee 37203

Tel.: (615) 252-2376

Attorneys for Solar Titan USA

